FEDERAL OCCUPATIONAL HEALTH

ASBESTOS AIR SAMPLING

COMPLETED FOR THE
GENERAL SERVICES ADMINISTRATION

Survey Location:

Chet Holifield Federal Building
General Services Administration
24000 Avila Road
Laguna Niguel, California 92677
GSA Building Number: CA0521SS

Survey Dates: March 23 and March 24, 2021
Report Date: March 31, 2021

Prepared By:

United States Public Health Service
Federal Occupational Health

FEDERAL OCCUPATIONAL HEALTH

A. EXECUTIVE SUMMARY

On March 23 and 24, 2021, the Federal Occupational Health (FOH) inspection team conducted asbestos air sampling throughout the Chet Holifield Federal Building located at 24000 Avila Road in Laguna Niguel, California (GSA Building Number: CA0521SS). Air sampling was conducted to verify that airborne fiber levels were at appropriate levels. Air samples were collected in common areas, storage rooms, file rooms and in occupied office spaces throughout the building. A total of seventy-two (72) air samples, two lab blanks and eight field blanks were collected and submitted for analysis using Transmission Electron Microscopy (TEM).

There are no current EPA regulations for general area air sampling and no regulatory action levels for direct comparison of airborne asbestos levels; however, the US Environmental Protection Agency (EPA) has regulations for area air sampling within containment after an asbestos abatement action has been completed. When performing general area asbestos air sampling, FOH compares the results to the EPA regulations.

Laboratory analysis indicated fiber levels for all samples to be less than 14 structures per millimeter squared (15 s/mm^2). In structures per cubic centimeter (s/cc) the results ranged from <0.0040 to <0.0050 s/cc of air.

For TEM AHERA samples, EPA uses the clearance level of 70 s/mm^2 after asbestos removal has been completed. This is the level at which EPA considers the space appropriate to return to general occupancy. Analytical results of all air samples indicate that asbestos concentrations were below the EPA clearance level of 70 s/mm^2. The Memorandum of Agreement (MOA) between the General Services Administration (GSA) and the US Citizenship and Immigration Services (USCIS) dated February 15, 2017 states that results less than 0.005 s/cc are considered acceptable. All results from the air sampling were less than 0.005 s/cc of air.

B. INTRODUCTION

On March 23 and 24, 2021, U.S. Public Health Service, Federal Occupational Health, inspection team members, Robert Gates and Ramona Ines conducted asbestos air sampling at the Chet Holifield Federal Building located at 24000 Avila Road, in Laguna Niguel, California (GSA Building Number: CA0521SS). Air samples were collected in common areas, storage rooms, file rooms and office spaces occupied by government agencies within the above referenced structure. A total of seventy-two (72) air samples, two lab blanks and eight field blanks were collected and analyzed for asbestos fibers using transmission electron microscopy (TEM) by EMSL Analytical, Inc. in Cinnaminson, New Jersey.

The Chet Holifield Federal Building is a United States Government Building managed by the General Service Administration and is occupied by government agencies. The 7-story pyramidal form building was constructed between 1967 and 1971 and is approximately 1,000,000 square foot in size. It is constructed of angled, painted, pre-cast concrete panels with reticulation, a textured finish that displays curvilinear forms and recessed anodized aluminum windows. The building has a concrete frame and the lateral force-resisting system consists of concrete shear walls and single-level concrete moment frames. This office space has carpeted and tiled floors, painted-sheetrock walls, drop ceilings, and the supply air is ducted while the return air is transported via the plenum area above the ceiling.

Before the survey, an opening conference was held with GSA Senior Property Manager Sherry Hutchinson, to discuss the procedures and the locations of the air sampling.

C. METHODS

Air sampling was conducted by drawing a known volume of air through a filter using flow-controlled pumps that were each pre and post calibrated. Calibration was made by using a Bios Defender 520 Primary Flow Calibrator, with a representative sampler in line. The filter media used was 0.45-micron pore-size mixed cellulose ester filter with backup pad. Each sample was collected open-faced in a 25-millimeter non-conducting cassette. Each sample was collected at breathing zone height. The samples were collected for approximately 2 hours and a sufficient volume of air was collected to meet the required limit of quantification for TEM analysis as well as meet the optimum fiber loading on the filter. Air samples were collected from common areas, storage rooms, file rooms and in occupied office spaces. A total of seventy-two (72) air samples, two lab blanks and eight field blanks were collected and analyzed for asbestos fiber concentrations using AHERA TEM. All samples were analyzed by EMSL Analytical, Inc., in Cinnaminson, NJ, an American Industrial Hygiene Association (AIHA) accredited laboratory.

D. RESULTS

Laboratory analysis indicated fiber levels for all samples to be less than 14 structures per millimeter squared (15 s/mm^2). In structures per cubic centimeter (s/cc) the results ranged from <0.0040 to <0.0050 s/cc of air.

Complete laboratory results and sample location plans can be found in Section F-Supporting Documents of this report.

E. DISCUSSION AND RECOMMENDATIONS

There are currently no regulations for general area air sampling for asbestos and no regulatory action levels by which results may be directly compared. The US Occupational Safety and Health Administration (OSHA) has regulations for worker exposure which entails sample collection by placing the sampling device in the employee's breathing zone. However, this was not the case and therefore FOH will not compare the area sampling results to the OSHA PEL of 0.10 fibers per cubic centimeter. The US EPA has regulations for area air sampling within containment after an asbestos abatement action has been completed. When performing general area asbestos air

sampling, FOH compares results to the EPA regulations. There are some differences in the method of collection since FOH did not collect the samples in containment, but the clearance level is the same.

For TEM samples, EPA uses the clearance level of 70 s/mm^2 after an asbestos removal has been completed. This is the level at which EPA considers the space appropriate to return to general occupancy. All of the samples collected by FOH have levels less than 70 s/mm^2.

The MOA between GSA and USCIS states that results less than 0.005 s/cc of air are considered acceptable. All sample results from this sampling event were less than 0.005 s/cc of air.

For any work that is conducted above the ceiling and in the plenum area, FOH recommends that such work be completed after hours while utilizing a negative pressure mini-containment to minimize occupant impact and contain any settled dust that may be disturbed.

F. SUPPORTING DOCUMENTS

The following supporting documents are attached to the report:

- Laboratory Report/Chain of Custody (14 pages)

Handwritten results have been redacted but are are accessible by contacting the GSA Field Office at 949-360-2022 .

EMSL Analytical, Inc.

200 Route 130 North Cinnaminson, NJ 08077

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USPHS/Federal Occupational Health
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Test Report: Asbestos Fiber Analysis by Transmission Electron Microscopy (TEM) Performed by EPA 40 CFR Part 763 Appendix A to Subpart E

Sample	Location	Volume (Liters)	Area Analyzed (mm²)	Non Asb	Asbestos Type(s)	#Structures ≥0.5µ < 5µ	#Structures ≥5µ	Analytical Sensitivity (S/cc)	Asbestos Concentration (S/mm²)	Asbestos Concentration (S/cc)
1-18-1670 *042106948-0001*	Exit 1070	1413.55	0.0650	0	None Detected	0	0	0.0042	<15.00	<0.0042
3-49-3208 *042106948-0002*	Office 7	1422.72	0.0650	0	None Detected	0	0	0.0042	<15.00	<0.0042
3-51-3156 *042106948-0003*	Copy Area	1390.96	0.0650	0	None Detected	0	0	0.0043	<15.00	<0.0043
3-62-3108 *042106948-0004*	Curbside 2512	1374.72	0.0650	0	None Detected	0	0	0.0043	<15.00	<0.0043
3-61-3108 *042106948-0005*	Storage near 3523	1335.15	0.0650	0	None Detected	0	0	0.0044	<15.00	<0.0044
4-63-4404 *042106948-0006*	Copy Area	1314.70	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045
4-64-4404 *042106948-0007*	Desk 4232	1296.24	0.0650	0	None Detected	0	0	0.0046	<15.00	<0.0046
4-66-4300 *042106948-0008*	Outside 4102	1274.52	0.0650	0	None Detected	0	0	0.0046	<15.00	<0.0046
U-1 *042106948-0009*	South Entrance	1275.16	0.0650	0	None Detected	0	0	0.0046	<15.00	<0.0046
2-33-Cafe *042106948-0010*	Café - Dining TV Wall	1324.59	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045
3-34-Cafe *042106948-0011*	Café Ice Machine	1294.28	0.0650	0	None Detected	0	0	0.0046	<15.00	<0.0046
2-36-2509 *042106948-0012*	Back Corner Curib Side	1225.12	0.0650	0	None Detected	0	0	0.0048	<15.00	<0.0048
2-40-Corridor *042106948-0013*	Room 2306	1224.50	0.0650	0	None Detected	0	0	0.0048	<15.00	<0.0048
2-44-Corridor *042106948-0014*	Corridor 2.13	1205.97	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
3-52-Corridor *042106948-0015*	Corridor 3357 Outside Restroom	1215.24	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
3-55-Corridor *042106948-0016*	Corridor 3506 Outside Door	1206.36	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
3-53-ICE *042106948-0017*	ICE 3363 First Room	1215.24	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
5-68-ICE *042106948-0018*	ICE 5160 Lobby	1213.39	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
1-8-1570 *042106948-0019*	CIS - Room 1570 - West Wall	1294.28	0.0650	0	None Detected	0	0	0.0046	<15.00	<0.0046

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1-10-1580	CIS - Room 1580 - Office 13008	1397.11	0.0650	0	None Detected	0	0	0.0042	<15.00	<0.0042
042106948-0020										
1-11-1580	CIS - Room 1580 - Office 13183	1378.27	0.0650	0	None Detected	0	0	0.0043	<15.00	<0.0043
042106948-0021										
1-12-1000	CIS - Room - Room 1000 - SE Corner	1338.49	0.0650	0	None Detected	0	0	0.0044	<15.00	<0.0044
042106948-0022										
1-13-1580	CIS - Room 1580 - Cubicle 13111	1310.17	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045
042106948-0023										
1-15-1700	CIS - Room 1700 - Entrance	1294.75	0.0650	0	None Detected	0	0	0.0046	<15.00	<0.0046
042106948-0024										
1-25-1600	CIS - Room - 1600 - NARA near 1-C-12	1293.42	0.0650	0	None Detected	0	0	0.0046	<15.00	<0.0046
042106948-0025										
1-23-1600	CIS - Room 1600 - CSC Warehouse Break Area	1277.25	0.0650	0	None Detected	0	0	0.0046	<15.00	<0.0046
042106948-0026										
1-26-1610	CIS - Warehouse 1610 - 1-G-12	1246.72	0.0650	0	None Detected	0	0	0.0048	<15.00	<0.0048
042106948-0027										
2-45-2300	CIS - 2300 - SW Corner	1371.20	0.0650	0	None Detected	0	0	0.0043	<15.00	<0.0043
042106948-0028										
2-46-2100	CIS - 2100 - Directors Sutie Conference Area	1353.78	0.0650	0	None Detected	0	0	0.0044	<15.00	<0.0044
042106948-0029										
2-47-2100	CIS - 2100 - Office 21120	1468.39	0.0650	0	None Detected	0	0	0.0040	<15.00	<0.0040
042106948-0030										
2-29-2100	CIS - 2100 - Hallway by Door 2113	1396.57	0.0650	0	None Detected	0	0	0.0042	<15.00	<0.0042
042106948-0031										
2-30-2100	CIS - 2100 - OIT Training Room	1417.68	0.0650	0	None Detected	0	0	0.0042	<15.00	<0.0042
042106948-0032										
3-60-3312	CIS - 3312 - E Corner Training Room	1402.11	0.0650	0	None Detected	0	0	0.0042	<15.00	<0.0042
042106948-0033										
3-54-3250	CIS - 3250 - Hallway by Break Room 316	1383.21	0.0650	0	None Detected	0	0	0.0043	<15.00	<0.0043
042106948-0034										
4-65-4105	CIS - 4105 - East Side near Break Room	1370.60	0.0650	0	None Detected	0	0	0.0043	<15.00	<0.0043
042106948-0035										

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6-69-6200 *042106948-0036*	CIS - 6200 - Office 6200A	1358.72	0.0650	0	None Detected	0	0	0.0044	<15.00	<0.0044
2-31-2200 *042106948-0037*	CIS - 2200 - Office 22002	1538.60	0.0520	0	None Detected	0	0	0.0048	<19.00	<0.0048
2-32-2200 *042106948-0038*	CIS - 2200 - Entrance and Cubicle 592	1526.75	0.0520	0	None Detected	0	0	0.0048	<19.00	<0.0048
2-35-2502 *042106948-0039*	CIS - 2502 Office 25082	1494.04	0.0520	0	None Detected	0	0	0.0050	<19.00	<0.0050
2-37-2410 *042106948-0040*	CIS - 2410 - Cubicle 24119	1470.75	0.0650	0	None Detected	0	0	0.0040	<15.00	<0.0040
2-38-2402 *042106948-0041*	Fireroom B - Outlet by B04	1469.14	0.0650	0	None Detected	0	0	0.0040	<15.00	<0.0040
2-39-2300 *042106948-0042*	CIS - 2300 - Work Station 23642	1363.59	0.0650	0	None Detected	0	0	0.0043	<15.00	<0.0043
2-41-2300 *042106948-0043*	CIS - 2300 - By Work Station 23560 by Fire Extinguisher	1330.27	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045
2-41-2300 *042106948-0044*	CIS - 2300 - Outside Potney Bows Room 23420	1309.85	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045
2-43-2300 *042106948-0045*	CIS - 2300 - By Cubicle 23320	1249.92	0.0650	0	None Detected	0	0	0.0047	<15.00	<0.0047
1-14-1220 *042106948-0046*	CIS - 2300 - Outlet by Exit	1539.72	0.0520	0	None Detected	0	0	0.0048	<19.00	<0.0048
1-28 *042106948-0047*	GSA - 1500 - Outlet by Door	1430.42	0.0650	0	None Detected	0	0	0.0041	<15.00	<0.0041
1-2-Corridor *042106948-0048*	GSA - Corridor - Outlet across 1400E	1380.39	0.0650	0	None Detected	0	0	0.0043	<15.00	<0.0043
1-3-Room 1400 *042106948-0049*	GSA - Room 1400 - Outlet by Eixt Door	1424.62	0.0650	0	None Detected	0	0	0.0042	<15.00	<0.0042
1-5-Storage Room *042106948-0050*	GSA - - Storage Room - Outlet by Front	1348.08	0.0650	0	None Detected	0	0	0.0044	<15.00	<0.0044
1-7-Corridor *042106948-0051*	GSA - Corridor - By 1236	1308.51	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045
1-9-1240	GSA - 1240 - Corridor Outside 1240	1330.76	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045

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042106948-0052										
7-72-Penthouse	GSA - Penthouse - Outlet by N17	1328.72	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045
042106948-0053										
7-71	GSA - Penthouse - M15	1303.40	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045
042106948-0054										
1-22- 1630	DCMA - 1630 - Office 27	1310.00	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045
042106948-0055										
1-21-1630	DCMA - 1630 - Outside by Confirm	1283.00	0.0650	0	None Detected	0	0	0.0046	<15.00	<0.0046
042106948-0056										
1-4-1552	ICE - 1552 - By Office 154	1265.92	0.0650	0	None Detected	0	0	0.0047	<15.00	<0.0047
042106948-0057										
1-6-Mat Rm	ICE - Mat Rm - SW Corner of Mat	1212.07	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
042106948-0058										
1-27-Corridor	Corridor by 1-A-9	1202.74	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
042106948-0059										
1-20-16400	Vacant - 1640D - Kitchenette	1212.07	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
042106948-0060										
1-24-Mech Rm	Mech Rm - South Wall	1219.54	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
042106948-0061										
1-19-1660	Vacant - 1660 - East Wall	1201.53	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
042106948-0062										
1-16-Corridor	Corridor by Rm 1700	1227.60	0.0650	0	None Detected	0	0	0.0048	<15.00	<0.0048
042106948-0063										
1-17-Corridor	Corridor Eat Wall Outlet	1368.96	0.0650	0	None Detected	0	0	0.0043	<15.00	<0.0043
042106948-0064										
3-48-3104	ICE - 3104 - Reception Desk	1326.68	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045
042106948-0065										
3-57-Childcare	Childcare - Room 2	1355.94	0.0650	0	None Detected	0	0	0.0044	<15.00	<0.0044
042106948-0066										
3-56-Kids Camp	Kids Camp - Recp Desk	1281.18	0.0650	0	None Detected	0	0	0.0046	<15.00	<0.0046
042106948-0067										
3-58-B322	Conference Rm 3322 - E Wall	1315.88	0.0650	0	None Detected	0	0	0.0045	<15.00	<0.0045
042106948-0068										
3-59-3315	Outlet by Map Wall	1278.56	0.0650	0	None Detected	0	0	0.0046	<15.00	<0.0046
042106948-0069										
3-50-3210	Vacant - 3210 - Rm 3218	1216.44	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
042106948-0070										

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5-67-5020	CBP - 5020 - By Grinder Office	1201.70	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
042106948-0071										
6-70-6140	ICE - 6140 Conference Rm 11	1204.14	0.0650	0	None Detected	0	0	0.0049	<15.00	<0.0049
042106948-0072										

Analyst(s)

Seri Smith (27)
Daniel Blake (3)
Sarah Richey (42)

Samantha Rundstrom, Laboratory Manager
or other approved signatory

Report amended: 04/23/2021 12:15 PM Replaces amended report from: 03/31/2021 14:36 PM Reason Code: Client-Other (see report comment)